

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WELLS FARGO BANK, NATIONAL ASSOCIATION, AS TRUSTEE FOR THE REGISTERED HOLDERS OF AMHERST PIERPOINT COMMERCIAL MORTGAGE SECURITIES LLC, MULTIFAMILY MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2019- SB59,	:	
	:	
	:	
	:	
	:	CIVIL ACTION
	:	
	:	NO. 2:25-CV-00157-ES-JSA
	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
MICH 424 PARK LLC,	:	
	:	
Defendant.	:	

NOTICE OF MOTION TO APPOINT A RECEIVER

PLEASE TAKE NOTICE that on February 18, 2025, at 9:00 a.m. or as soon thereafter as counsel may be heard, Plaintiff, Wells Fargo Bank, National Association, as Trustee for the registered holders of Amherst Pierpoint Commercial Mortgage Securities LLC, Multifamily Mortgage Pass-Through Certificates, Series 2019-SB59 (“Lender”), by and through its undersigned counsel, will move the United States District Court for the District of New Jersey, located at the Martin Luther King, Jr. Building & U.S. Courthouse at 50 Walnut Street, Newark, New

Jersey, 07102, to appoint a receiver for the subject property in this commercial mortgage foreclosure action.

PLEASE TAKE FURTHER NOTICE that, in support of its motion, Lender will rely on its accompanying Brief, the Declaration of Ethan J. Meyer and the Declaration of Raymond A. Quaglia.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is enclosed.

Respectfully submitted,

Dated: January 22, 2025

/s/ Raymond A. Quaglia

Raymond A. Quaglia, Esq.

Facundo Bouzat, Esq.

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